

Alternative Compliance Tutorial

Module 4: Assembling a Waiver Request

April 2008



Alternative Compliance Tutorial

Module 4

Assembling a Waiver Request



Alternative Compliance Tutorial

Module 4: Assembling a Waiver Request



Alternative Compliance Tutorial

There are five modules in this training package:

- [Module 1: Alternative Compliance Overview](#)
- [Module 2: Submitting an Intent to Apply for a Waiver](#)
- [Module 3: Maintaining Your Alternative Compliance Vehicle Inventory](#)
- Module 4: Assembling a Waiver Request
- [Module 5: Completing an Annual Report](#)

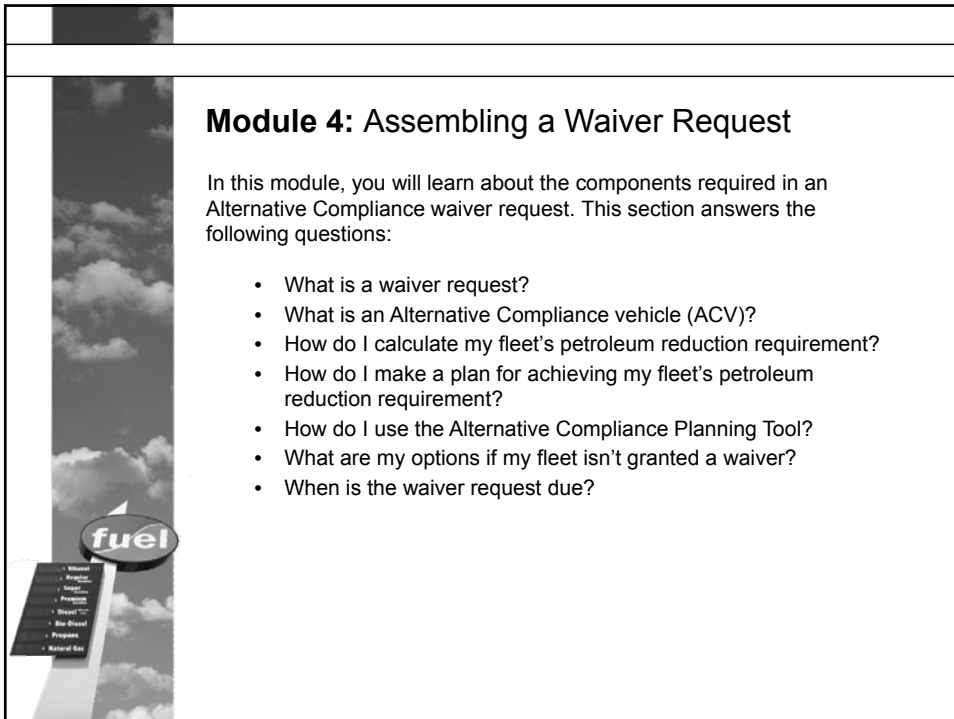
You are starting Module 4. When you are finished, please proceed to the next module for additional instructions on how to participate in the Alternative Compliance option.



Module 4: Assembling a Waiver Request

In this module, you will learn about the components required in an Alternative Compliance waiver request. This section answers the following questions:

- What is a waiver request?
- What is an Alternative Compliance vehicle (ACV)?
- How do I calculate my fleet's petroleum reduction requirement?
- How do I make a plan for achieving my fleet's petroleum reduction requirement?
- How do I use the Alternative Compliance Planning Tool?
- What are my options if my fleet isn't granted a waiver?
- When is the waiver request due?

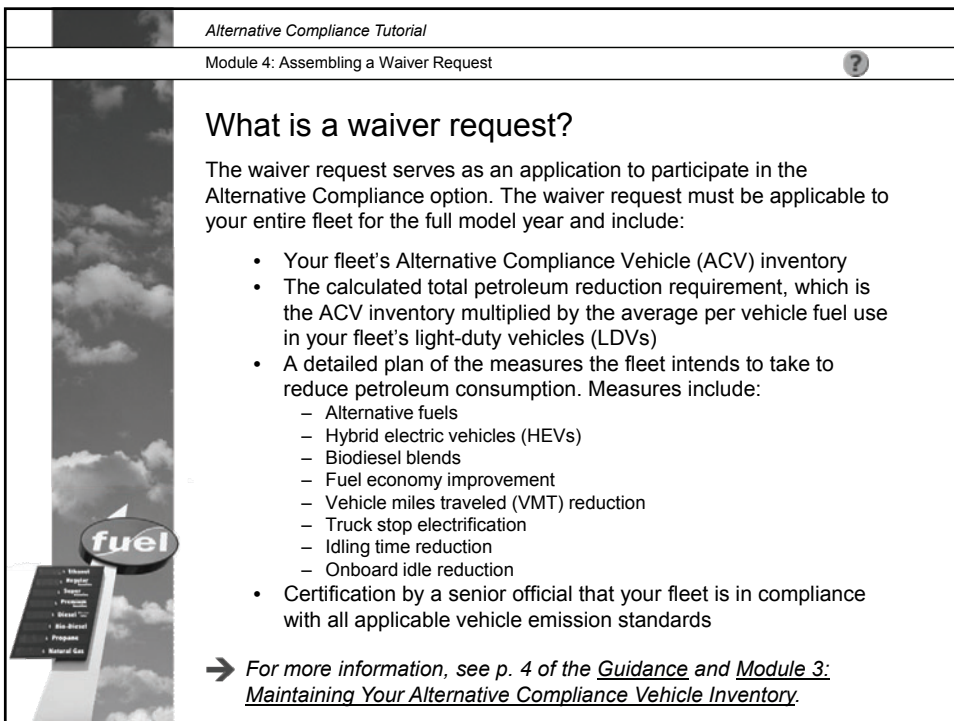


What is a waiver request?

The waiver request serves as an application to participate in the Alternative Compliance option. The waiver request must be applicable to your entire fleet for the full model year and include:

- Your fleet's Alternative Compliance Vehicle (ACV) inventory
- The calculated total petroleum reduction requirement, which is the ACV inventory multiplied by the average per vehicle fuel use in your fleet's light-duty vehicles (LDVs)
- A detailed plan of the measures the fleet intends to take to reduce petroleum consumption. Measures include:
 - Alternative fuels
 - Hybrid electric vehicles (HEVs)
 - Biodiesel blends
 - Fuel economy improvement
 - Vehicle miles traveled (VMT) reduction
 - Truck stop electrification
 - Idling time reduction
 - Onboard idle reduction
- Certification by a senior official that your fleet is in compliance with all applicable vehicle emission standards

➔ For more information, see p. 4 of the [Guidance](#) and [Module 3: Maintaining Your Alternative Compliance Vehicle Inventory](#).





How do I calculate my fleet's petroleum reduction requirement?

Step 1: Calculate the Petroleum Reduction Requirement

Once the total number of vehicles in your ACV inventory is determined, multiply this number by the average per vehicle fuel use, in gasoline gallon equivalents (GGE), in your fleet LDVs.

$$\text{Petroleum Reduction Requirement} = \text{ACV inventory} \times \text{Average fuel use per covered fleet LDV}$$

For average LDV fuel-use data, the U.S. Department of Energy (DOE) will accept:

- Fuel-use data collected from covered LDVs (preferred)
- Estimates based on actual mileage data and fuel economy values published on www.fueleconomy.gov
- General fleet or industry statistics supplemented with statistical sampling of the fleet

➔ For more information, see p. 5 of the [Guidance](#).



How do I calculate my fleet's petroleum reduction requirement?

After an average-fuel-use-per-LDV value is developed for your fleet's first year of Alternative Compliance, this value is used to calculate your requirement in all subsequent years. The following timeline shows how a fleet will determine its petroleum reduction over a five-year period.

Example for an Alternative Fuel Provider Fleet

YEAR 1	<ul style="list-style-type: none"> • 25 pre-waiver required AFVs in the fleet previously reported to DOE in an annual report (DOE/FCVT/101) and still in the fleet • 9 requirements (90% of 10 planned LDV acquisitions)* • ACV inventory: 34 (25 + 9 = 34) • Average annual fuel use per LDV: 500 GGE • Petroleum reduction requirement amount: 17,000 GGE (500 GGE x 34 vehicles)
YEAR 2	<ul style="list-style-type: none"> • 15 pre-waiver required AFVs remaining in the fleet (10 were retired and no longer included) • 9 requirements (90% of 10 planned LDV acquisitions for Year 2)* • 9 requirements in the first year • ACV inventory: 33 (15 + 9 + 9 = 33) • Average annual fuel use per LDV: 500 GGE • Petroleum reduction requirement amount: 16,500 GGE (500 GGE x 33 AFVs)

* Identifying data on LDVs representing requirements acquired during a waiver year should be reported in the ACV inventory.

Years 3 through 5 on next slide.



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How do I calculate my fleet's petroleum reduction requirement?

YEAR 3

- 5 pre-waiver required AFVs in the fleet (10 more were retired from the previous year)
- 9 requirements (90% of planned 10 LDV acquisitions in Year 3)*
- 18 requirements from previous two Alternative Compliance years (9 from first year plus 9 from second year)
- ACV inventory: 32 (5 + 9 + 9 + 9 = 32)
- Average annual fuel use per LDV: 500 GGE
- Petroleum reduction requirement amount: 16,000 GGE (500 GGE x 32 AFVs)

YEAR 4

- 0 pre-waiver required AFVs in the fleet (remaining 5 were retired)
- 9 requirements (90% of 10 planned LDV acquisitions in Year 4)*
- 27 requirements from previous three Alternative Compliance years (9 each from Years 1, 2, and 3)
- ACV inventory: 36 (9 + 9 + 9 + 9 = 36)
- Average annual alternative fuel use per AFV: 500 GGE
- Petroleum reduction requirement amount: 18,000 GGE (500 GGE x 36 AFVs)

YEAR 5

- 0 pre-waiver required AFVs
- 9 requirements (90% of 10 planned LDV acquisitions in Year 5)*
- 27 requirements from previous three Alternative Compliance years (9 each from years 2, 3 and 4)
- 9 LDV retirements from Year 1
- ACV inventory: 36 (9 + 9 + 9 + 9 = 36)
- Average annual alternative fuel use per AFV: 500 GGE
- Petroleum reduction requirement amount: 18,000 GGE (500 GGE x 36 AFVs)

* Identifying data on LDVs representing requirements acquired during a waiver year should be reported in the ACV inventory.

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How do I make a plan for achieving my fleet's petroleum reduction requirement?

Step 2: Develop a Plan for Achieving the Annual Petroleum Reduction Requirement


After determining your petroleum reduction requirement, you must develop a plan for achieving it. Your plan can include many different strategies:

- AFVs or fuel-efficient technologies in any-sized, on-road vehicle
- Biodiesel blends
- HEVs
- Idle reduction technologies
- Replacement fuels in qualified non-road vehicles
- Reduced VMT

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Module 4: Assembling a Waiver Request

?



- Internet
- Regulation
- Energy
- Programs
- State Tools
- Bio Diesel
- Propane
- Natural Gas

How do I make a plan for achieving my fleet's petroleum reduction requirement?


There are two ways to develop a petroleum reduction plan:

- Use the automated Alternative Compliance Planning Tool (preferred)
- Use the petroleum reduction calculation methodology outlined in *Appendices E and F in the Guidance*.

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?



- Internet
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- Propane
- Natural Gas

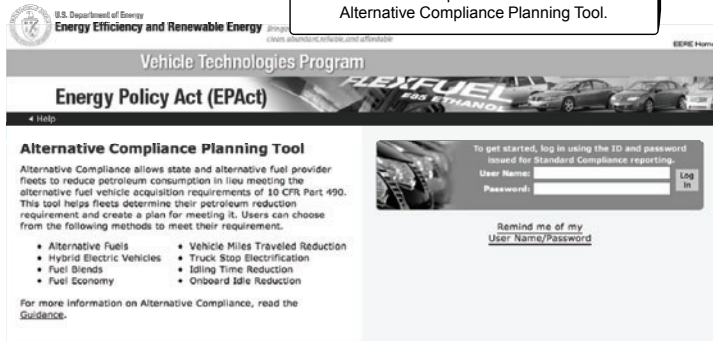
How do I use the Alternative Compliance Planning Tool?

DOE created the interactive, online Alternative Compliance Planning Tool (www.eere.energy.gov/vehiclesandfuels/epact/state/acp_tool) to help fleets calculate their petroleum reduction requirement and develop their plans to achieve it.

Following is a series of slides demonstrating how to use the Alternative Compliance Planning Tool. Each slide has one or more pop-up text boxes. In the full-screen mode, the text boxes will appear automatically, and you will be prompted when it's time to proceed to the next page. In the window mode, you will need to click to make each text box appear and proceed to the next page.



This demonstration provides an overview of the Alternative Compliance Planning Tool.

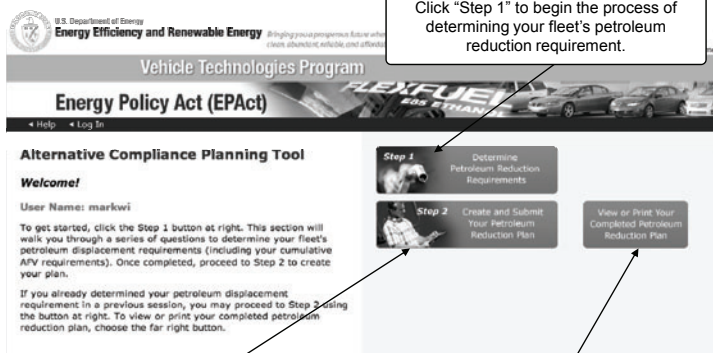


Go to

www.eere.energy.gov/vehiclesandfuels/epact/state/acp_tool/,
and log in using your fleet ID and password.



Click “Step 1” to begin the process of determining your fleet’s petroleum reduction requirement.



If you have already completed Step 1, you can create and submit your petroleum reduction plan by clicking the "Step 2" button.

OR

You can click this button to view or print your petroleum reduction plan.



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Module 4: Assembling a Waiver Request

U.S. Department of Energy
Energy Efficiency and Renewable Energy

Vehicle Technologies Program

Energy Policy Act (EPAct)

Step 1: Determine Your Petroleum Reduction Requirements

Answer the following questions to determine your petroleum reduction requirement. After filling in the fields, click Save Inputs and a summary of your results will appear in the box at right.

Note: If you have an approved intent to apply for a waiver, you may check your current Alternative Compliance Vehicle (ACV) inventory by clicking the button below. If your intent to apply for a waiver has not been approved, the button does not appear.

Model year (MY) for which you are applying:

2009

Insert your ACV inventory total:

150

Insert your average fuel use per light-duty vehicle (LDV) in your fleet:

400

Access Your Current ACV Inventory Record

Save Inputs

Results

EPAct Fleet ID: 1255

The

The

the

Print Results for Your Records

Now Proceed to Step 2: Create Your Petroleum Reduction Plan

Proceed to Next Slide

fuel

Internet

Energy

Energy

Energy

Energy

Energy

Energy

Energy

Energy

Energy

Step 1 begins by asking two questions to determine your fleet's petroleum reduction requirements.

If your fleet received DOE approval on an intent to apply for a waiver for the upcoming year, you can access your ACV inventory here.

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Module 4: Assembling a Waiver Request

U.S. Department of Energy
Energy Efficiency and Renewable Energy

Vehicle Technologies Program

Energy Policy Act (EPAct)

Step 1: Determine Your Petroleum Reduction Requirements

Answer the following questions to determine your petroleum reduction requirement. After filling in the fields, click Save Inputs and a summary of your results will appear in the box at right.

Note: If you have an approved intent to apply for a waiver, you may check your current Alternative Compliance Vehicle (ACV) inventory by clicking the button below. If your intent to apply for a waiver has not been approved, the button does not appear.

Model year (MY) for which you are applying:

2009

Insert your ACV inventory total:

150

Insert your average fuel use per light-duty vehicle (LDV) in your fleet:

400

Access Your Current ACV Inventory Record

Save Inputs

Results

EPAct Fleet ID: 1255

You will be asked to input:

- The number of ACVs currently in your fleet
- Your average fuel use per light-duty vehicle

Print Results for Your Records

Now Proceed to Step 2: Create Your Petroleum Reduction Plan

Proceed to Next Slide

fuel

Internet

Energy

Energy

Energy

Energy

Energy

Energy

Energy

Energy

Energy

Click "Save Inputs" to see your results.

Click "Save Inputs" to see your results.

Alternative Compliance Tutorial
Module 4: Assembling a Waiver Request

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Alternative Compliance Planning Tool
Step 1: Determine Your Petroleum Reduction Requirements
Answer the following questions to determine your petroleum reduction requirement. After filling in the fields, click Save Inputs and a summary of your results will appear in the box at right.
Note: If you have an approved intent to apply for a waiver, you may check your current Alternative Compliance vehicles (ACV) inventory by clicking the button below. If your intent to apply for a waiver has not been approved, the button does not appear.

Model year (MY) for which you are applying: **2009**

Insert your ACV inventory total: **150**
This is the number of alternative compliance vehicles that will be in your fleet for any part of the waiver model year and have not been retired from your ACV inventory due to banked credits.

Insert your average fuel use per light-duty vehicle (LDV) in your fleet: **400**

Access Your Current ACV Inventory Record

Save Inputs

Results
EPAct Fleet ID: 1255
MY 2009 Petroleum Reduction Requirement: **60,000 GGE**
Your petroleum reduction requirement for the model year is listed above. To change your fleet information, enter the new data in the boxes at left and press Save Inputs.
Model year for which you are applying: **2009**
ACV inventory total: **150**
Average fuel use per LDV: **400 GGE/year**
Print Results for Your Records
Now Proceed to Step 2: Create Your Petroleum Reduction Plan

Your petroleum reduction requirement is calculated from the data you enter.

You can print your results.

Then proceed to Step 2 to create your petroleum reduction plan.

Proceed to Next Slide

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Module 4: Assembling a Waiver Request

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Alternative Compliance Planning Tool
Step 2: Create Your Petroleum Reduction Plan
Use the color-coded tabs below to choose a method you would like to explore. Your plan can contain any combination. After saving your inputs, switch methods by choosing another tab.
When developing a plan, remember it is just that, a plan. Actual fleet experience may differ. Therefore, to ensure your fleet meets its requirement, make conservative projections. There are two ways to do this: Estimate lower and plan higher. For example, if you think your fleet will use 65-75% of the time, lower your estimate to 70%. If your petroleum requirement is 10,000 GGE, plan for 11,000 GGE. That way, you'll be covered if you run into a problem.

Alternative Fuels
HEVs
Biodiesel Blends
Fuel Economy
VMT Reduction
Truck Stop Electrification
Idling Time Reduction
Onboard TR

Generate Plan

Results
EPAct Fleet ID: 1255
Annual Petroleum Reduction Requirement: **60,000 GGE**
Required = 60,000 GGE
0
10,000
20,000
30,000
40,000
50,000
60,000

Choose a reduction method by clicking one of the tabs above. You can use a combination of any of the methods shown. This example demonstrates the HEVs and biodiesel blends methods, starting with HEVs.

Proceed to Next Slide

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- Internet
- Energy
- Transportation
- Buildings
- Water
- Land Use
- Waste
- Other

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Help Log In Step 1

Alternative Compliance Planning Tool

Step 2: Create Your Petroleum Reduction Plan

To calculate the petroleum reduction potential of **Hybrid Electric Vehicles**, fill in the boxes below using your **actual historical fleet data**. Default values based on nationwide statistics are provided; however, since your own fleet operations can vary considerably from these averages, we strongly recommend you use fleet-specific data.

When developing a plan, remember it is just that, a plan. Actual fleet experience may differ. Therefore, to ensure your fleet meets its requirement, make conservative projections. There are two ways to do this: Estimate lower and plan higher. For example, if you think your fleet will use 85% 75% of the time, lower your estimate to 70%. If your petroleum requirement is 10,000 GGE, plan for 11,000 GGE. That way, you'll be covered if you run into a problem.

Alternative Fuels	HEVs	Biodiesel Blends	Fuel Economy	VMT Reduction	Truck Stop Electrification	Idling Time Reduction	Onboard IR
Hybrid Electric Vehicles (HEVs)							
Fuel Type*	Number of Vehicles*	Average VMT*	Fuel Economy of New HEVs*	Fuel Economy of Old Vehicles*			
Gasoline	20	13350	45	19			

Required: 60,000 GGE

Results:

EPAct Fleet ID: 1255
 Annual Petroleum Reduction Requirement: **60,000 GGE**

Required = 60,000 GGE

60,000
50,000
40,000
30,000
20,000
10,000

Click "Save Inputs" when you are done.

Save Inputs

Generate Plan

Proceed to Next Slide

You will be asked to input:

- Fuel type
- Number of vehicles
- Average VMT
- Fuel economy of new HEVs
- Fuel economy of old vehicles

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Module 4: Assembling a Waiver Request

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Help Log In Step 1

Alternative Compliance Planning Tool

Step 2: Create Your Petroleum Reduction Plan

To calculate the petroleum reduction potential of **Hybrid Electric Vehicles**, fill in the boxes below using your **actual historical fleet data**. Default values based on nationwide statistics are provided; however, since your own fleet operations can vary considerably from these averages, we strongly recommend you use fleet-specific data.

When developing a plan, remember it is just that, a plan. Actual fleet experience may differ. Therefore, to ensure your fleet meets its requirement, make conservative projections. There are two ways to do this: Estimate lower and plan higher. For example, if you think your fleet will use 85% 75% of the time, lower your estimate to 70%. If your petroleum requirement is 10,000 GGE, plan for 11,000 GGE. That way, you'll be covered if you run into a problem.

Alternative Fuels	HEVs	Biodiesel Blends	Fuel Economy	VMT Reduction	Truck Stop Electrification	Idling Time Reduction	Onboard IR
Hybrid Electric Vehicles (HEVs)							
Fuel Type*	Number of Vehicles*	Average VMT*	Fuel Economy of New HEVs*	Fuel Economy of Old Vehicles*			
Gasoline	20	13350	45	19			

Required: 60,000 GGE

Results:

EPAct Fleet ID: 1255
 Annual Petroleum Reduction Requirement: **60,000 GGE**

Required = 60,000 GGE

60,000
50,000
40,000
30,000
20,000
10,000

and progress made toward the requirement is shown.

Save Inputs

Generate Plan

Proceed to Next Slide

The petroleum reduction is calculated in GGEs,

GGE Reduced: **8,119**

Save Edits

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Help Log In Step 1

Alternative Compliance Planning Tool
Step 2: Create Your Petroleum Reduction Plan

To calculate the petroleum reduction potential of **hybrid Electric Vehicles**, fill in the boxes below using your **actual historical fleet data**. Default values based on nationwide statistics are provided, but your own fleet operations can vary considerably from these nationwide averages.

When developing a plan, remember it is just that, a plan. Actual fleet experience may differ, so make conservative projections. There are two ways to do this: Estimate lower and plan to use 85% 75% of the time, lower your estimate to 70%. If your petroleum requirement is 10,000 GGE, plan for 11,000 GGE. That way, you'll be covered if you run into a problem.

Click the "Biodiesel Blends" tab.

To delete an input line, click the "Delete" box, and press "Save Edits."

Fuel Economy (EVS)	VMT Reduction	Truck Stop Electrification	Idling Time Reduction	Onboard IR
Average VMT*	Fuel Economy of New HEVs*	Fuel Economy of Old Vehicles*		
Gasoline	20	13350	45	19

Delete: ☐

Required

Results

EPAct Fleet ID: 1255
Annual Petroleum Reduction Requirement: **60,000 GGE**

Required = 60,000 GGE

Reduced: 8,119

Save Edits

Generate Plan

fuel

- Internet
- Energy
- Transportation
- Buildings
- Water
- Waste
- Other
- Material

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Help Log In Step 1

Alternative Compliance Planning Tool
Step 2: Create Your Petroleum Reduction Plan

To calculate the petroleum reduction potential of your **actual historical fleet data**. Default values are provided for fleets that don't have specific information. These fields are not marked with an asterisk.

When developing a plan, remember it is just that, a plan. Actual fleet experience may differ, so make conservative projections. There are two ways to do this: Estimate lower and plan to use 85% 75% of the time, lower your estimate to 70%. If your petroleum requirement is 10,000 GGE, plan for 11,000 GGE. That way, you'll be covered if you run into a problem.

Click "Save Inputs" when you are done.

You will be asked to input:

- Vehicle type
- Blend type
- Number of vehicles
- Fraction of fuel use

In some cases, default values are provided for fleets that don't have specific information. These fields are not marked with an asterisk.

Alternative Fuels	HEVs	Biodiesel Blends	Fuel Economy	VMT Reduction	Truck Stop Electrification	Idling Time Reduction	Onboard IR
Vehicle Type*	Blend Type*	Number of Vehicles*	Average VMT	Fraction of Fuel Use*	Fuel Economy		
Large Pickup/Utility Diesel	B20	55	13350	0.9	45	19	

Delete: ☐

Required

Results

EPAct Fleet ID: 1255
Annual Petroleum Reduction Requirement: **60,000 GGE**

Required = 60,000 GGE

Reduced: 8,119

Save Edits

Generate Plan

fuel

- Internet
- Energy
- Transportation
- Buildings
- Water
- Waste
- Other
- Material


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Help Log In Step 1

Alternative Compliance Planning Tool
Step 2: Create Your Petroleum Reduction Plan

To calculate the petroleum reduction potential of **Biodiesel Blends**, fill in the boxes below using your actual historical fleet data. Default values based on nationwide statistics are provided; however, since your own fleet operations can vary considerably from these averages, we strongly recommend you use fleet-specific data.

When developing a plan, remember it is just that, a plan. Actual fleet experience may differ. Therefore, to ensure your fleet meets its requirement, make conservative projections. There are two ways to do this: Estimate lower and plan higher. For example, if you think your fleet will use 85% 75% of the time, lower your estimate to 70%. If your petroleum requirement is 10,000 GGE, plan for 11,000 GGE. That way, you'll be covered if you run into a problem.

Vehicle Type*	Blend Type*	Number of Vehicles*	Average VMT	Fraction of Fuel Use*	Fuel Economy
Pick from list	Pick from list				
Save Inputs					
Vehicle Type*	Blend Type*	Number of Vehicles*	Average VMT	Fraction of Fuel Use*	Fuel Economy
Large Pickup/Utility Diesel	820	55	11467	.9	21.2
Delete: <input type="checkbox"/>					
GGE Reduced: 5,565					
Save Edit					
Generate Plan					

* Required

Results

EPAct Fleet ID: 1255

Annual Petroleum Reduction Requirement: **60,000 GGE**

Required = 60,000 GGE


60,000
50,000
40,000
30,000
20,000
10,000
0


10,000

10,565

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Help Log In Step 1

Alternative Compliance Planning Tool
Step 2: Create Your Petroleum Reduction Plan

To calculate the petroleum reduction potential of **Biodiesel Blends**, fill in the boxes below using your actual historical fleet data. Default values based on nationwide statistics are provided; however, since your own fleet operations can vary considerably from these averages, we strongly recommend you use fleet-specific data.

When developing a plan, remember it is just that, a plan. Actual fleet experience may differ. Therefore, to ensure your fleet meets its requirement, make conservative projections. There are two ways to do this: Estimate lower and plan higher. For example, if you think your fleet will use 85% 75% of the time, lower your estimate to 70%. If your petroleum requirement is 10,000 GGE, plan for 11,000 GGE. That way, you'll be covered if you run into a problem.

Vehicle Type*	Blend Type*	Number of Vehicles*	Average VMT	Fraction of Fuel Use*	Fuel Economy
Pick from list	Pick from list				
Save Inputs					
Vehicle Type*	Blend Type*	Number of Vehicles*	Average VMT	Fraction of Fuel Use*	Fuel Economy
Large Pickup/Utility Diesel	820	55	11467	.9	21.2
Delete: <input type="checkbox"/>					
GGE Reduced: 5,565					
Save Edit					
Generate Plan					

* Required

Results

EPAct Fleet ID: 1255

Annual Petroleum Reduction Requirement: **60,000 GGE**

Required = 60,000 GGE

60,000
50,000
40,000
30,000
20,000
10,000
0


10,000

10,565

After the default values are supplied,

the GGE reduction from the method is calculated.

After inputting data for all the methods applicable to your fleet, click "Generate Plan."

Proceed to Next Slide 

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Help Log In Step 1 Step 2

Petroleum Reduction Plan
EPA Fleet ID: 1255
Annual Petroleum Reduction Requirement: 60,000 GGE
27% realized

Based on your inputs, this is your petroleum reduction requirement. If you are satisfied with this plan, print it, obtain the signature of a senior official, and mail it to DOE as part of your Alternative Compliance waiver application package.

To alter your plan, return to Step 2.

Required = 60,000 GGE

The plan summarizes all the methods your fleet will use to meet its petroleum reduction requirement.

Alternative Fuels

AFV Type	AFV Fuel	Number of AFVs	Average VMT	Fuel Economy (mpg)	Fraction of Fuel Use	GGE Reduced
Compact Car	E85	10	10000	25	.6	2400
TOTAL GGE						2400

Hybrid Electric Vehicles (HEVs)

Fuel Type	Number of Vehicles	Average VMT	Fuel Economy of new HEVs	Fuel Economy of Old Vehicles	GGE Reduced
Gasoline	20	13350	45	19	8119
TOTAL GGE					8119

End of demonstration.

Proceed to Next Slide

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When is the waiver request due?

Waiver requests are due to DOE no later than June 30 or July 31 before the model year for which a waiver is being requested.

June 30	July 31
If the waiver request is not dependent on the availability of new model vehicles from manufacturers	If the waiver request is dependent on availability of new model vehicles from manufacturers

➔ For more information on the waiver request procedure, go to Module 4: Completing an Annual Report.

Alternative Compliance Tutorial

Module 4: Assembling a Waiver Request

?

fuel

• Diesel

• Propane

• Natural Gas

• Bio Diesel

• Propane

• Natural Gas

Where do I send my completed waiver request?

Send your completed waiver request package no later than the June 30 or July 31 deadline to:

Mr. Dana O'Hara
Regulatory Manager
U.S. Department of Energy
EE-2G/Forrestal Building
1000 Independence Ave., SW
Washington, D.C. 20585

➔ *For more information on what is included in a waiver request, see p. 18 of the [Guidance](#).*

Once it receives your **completed** waiver request, DOE has 45 days to review it. If DOE determines it needs more information to approve your waiver request, the 45-day review period will start from the time DOE receives the additional information.

➔ *For more information on DOE's waiver approval process, see p. 9 of the [Guidance](#).*

Alternative Compliance Tutorial

Module 4: Assembling a Waiver Request

?

fuel

• Diesel

• Propane

• Natural Gas

• Bio Diesel

• Propane

• Natural Gas

What are my options if my fleet isn't granted a waiver?

Appeals

If your fleet's waiver request is rejected, you may appeal the decision to DOE's Office of Hearings and Appeals using procedures documented in 10 CFR 490.204(h) and 490.308(g).

Appeals must be filed within 30 days of notification that DOE rejected your waiver request.

If your fleet's waiver request is rejected and you choose not to appeal the decision, your fleet must comply with the Standard Compliance option during the upcoming model year.



How long should I hold on to my records?

Fleets granted Alternative Compliance waivers must keep documentation to verify petroleum reduction claims for three years after the end of the subject model year. The same three-year rule applies to fleets under the Standard Compliance requirements.

Records include, but are not limited to, documents such as vehicle and fuel purchase receipts, inventory records, and vehicle retirement dates.



Congratulations!

You have completed Module 4: Assembling a Waiver Request.

Please proceed to: [Module 5: Completing an Annual Report](#).

